

Winnebago Reclamation Service, Inc.



February 27, 1992

Recycling and
waste disposal

Mr. Bernie Schorle
Remedial Project Manager
U.S.E.P.A.
230 S. Dearborn
Chicago, IL 60604

Dear Bernie:

Thank you for the revised pages. I also wanted to pass along some of my thoughts and concerns about the arsenic performance standard and the related alternative water supply issue. My concern is that a standard based on a cancer risk index of 1×10^{-5} is so severe that it cannot be achieved.

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Hills Road
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The MCL for arsenic is 50 ppb. Based on my calculations, the level of arsenic in groundwater necessary to achieve a 1×10^{-5} cancer index using the assumptions in the R1 is approximately 0.4 ppb. That is one one-hundred-twenty-fifth of the MCL. That fact alone, however, is not the only problem with this standard.

Arsenic was detected in wells near Pagels and in wells at Acme in roughly the same concentrations and the same proportion of detections. At Acme, however, arsenic was not considered a chemical of concern. The Acme endangerment assessment eliminates arsenic entirely because it is not carcinogenic by ingestion; the assessment concluded that arsenic was carcinogenic by inhalation but not ingestion.


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Second, background arsenic levels are higher than those necessary to achieve the proposed performance standard. The determination of background at Pagels has been complicated by arguments over levels at Acme Solvents, but the levels used at Acme Solvents as background arguably reflect a true background. The background arsenic level used at Acme Solvents ranged from 1 ppb to 8 ppb. By contrast, the exposure level assumed in the Pagels Risk Assessment was only 8.4 ppb. That level is only five percent (5%) above background, and risk assessments generally ignore levels that are as high as five times background for statistical reasons.

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As a result, there could be two adjoining sites with pump and treat systems in the same aquifer in very close proximity. One would be reducing arsenic contamination to the MCL and the other would be required to go two orders of magnitude farther. If we were obligated to provide alternative drinking water, we would have to do so using a system separate from the one used by Acme. Finally, the discharge limits required for both systems would presumably be the MCL or higher (the Illinois Standard for discharge to waterways is 250 ppb). It seems to be a substantial waste of resources to pump the water out of the ground just to discharge it directly into the creek. It is especially wasteful if the Acme system could be discharging to a creek that recharges the aquifer upgradient of us at levels that are a hundred times above our performance standard.

Very truly yours,


John Holmstrom III
Winnebago Reclamation Service

JH/cc

P.S. I enclose the language that I was to provide for the SOW.

Insert

Statement of Work

Page 8, line 2.

Such wastes shall not, however, be considered to be hazardous wastes solely because they are generated in the performance of the Remedial Action if they are not otherwise considered to be hazardous wastes under state or federal law.